

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

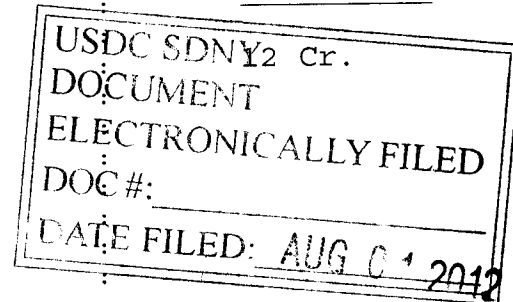
UNITED STATES OF AMERICA

- v. -

SAMUEL ASHKENAZI,
a/k/a "Haim Veinberg,"
a/k/a "Joseph,"
a/k/a "Sam,"
SAMUEL BLAU, and
SAMUEL GOLDBERGER,
a/k/a "Benzi,"

Defendants.

SEALED
INDICTMENT



12 CRIM 581

COUNT ONE

The Grand Jury charges:

1. From at least in or about December 2011, up to and including in or about April 2011, in the Southern District of New York and elsewhere, SAMUEL ASHKENAZI, a/k/a "Haim Veinberg," a/k/a "Joseph," a/k/a "Sam," SAMUEL BLAU, and SAMUEL GOLDBERGER, a/k/a "Benzi," the defendants, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1957(a).

2. It was a part and an object of the conspiracy that SAMUEL ASHKENAZI, a/k/a "Haim Veinberg," a/k/a "Joseph," a/k/a "Sam," SAMUEL BLAU, SAMUEL GOLDBERGER, a/k/a "Benzi," the defendants, and others known and unknown, knowing that the

JUDGE CASTEL

property involved in certain financial transactions represented the proceeds of some form of unlawful activity, knowingly would and did conduct and attempt to conduct such financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, to wit, narcotics trafficking, and knowing that such transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

3. It was a further part and an object of the conspiracy that SAMUEL ASHKENAZI, a/k/a "Haim Veinberg," a/k/a "Joseph," a/k/a "Sam," SAMUEL BLAU, SAMUEL GOLDBERGER, a/k/a "Benzi," the defendants, and others known and unknown, within the United States and involving United States persons, in an offense involving and affecting interstate and foreign commerce, knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, to wit, narcotics trafficking, in violation of Title 18, United States Code, Section 1957(a).

Overt Acts

4. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others,

were committed in the Southern District of New York and elsewhere:

a. On or about January 8, 2012 and January 9, 2012, SAMUEL ASHKENAZI, a/k/a "Haim Veinberg," a/k/a "Joseph," a/k/a "Sam," the defendant, picked up approximately \$10,000 in bulk currency in Boston, Massachusetts, in a transaction arranged by co-conspirators not named as defendants herein ("CC-1" and "CC-2") and delivered it to SAMUEL GOLDBERGER, a/k/a "Benzi," the defendant, at his check cashing business in Brooklyn, New York.

b. On or about January 23, 2012 and January 24, 2012, ASHKENAZI picked up approximately \$400,000 in bulk currency from two co-conspirators not named as defendants herein ("CC-3" and "CC-4") in Hartford, Connecticut, in a transaction arranged by CC-1 and CC-2, and delivered it to GOLDBERGER at his check cashing business in Brooklyn, New York.

c. On or about January 24, 2012, law enforcement stopped another transaction between CC-3, CC-4 and ASHKENAZI in Hartford, Connecticut, and seized approximately \$390,000 in bulk currency and 0.5 kilograms of cocaine.

d. On or about March 2, 2012, ASHKENAZI and SAMUEL BLAU, the defendant, arranged for the pickup of approximately \$300,000 in bulk currency at an apartment in New York, New York.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION AS TO COUNT ONE

5. As a result of committing the money laundering offense alleged in Count One of this Indictment, SAMUEL ASHKENAZI, a/k/a "Haim Veinberg," a/k/a "Joseph," a/k/a "Sam," SAMUEL BLAU, and SAMUEL GOLDBERGER, a/k/a "Benzi," the defendants, pursuant to Title 18, United States Code, 982(a)(1), shall forfeit to the United States of America any property, real and personal, involved in the offense, and any property traceable to such property, including, but not limited to a sum of money representing the amount of proceeds involved in the offense.


6. If any of the above-described forfeitable property, as a result of any act or omission of SAMUEL ASHKENAZI, a/k/a "Haim Veinberg," a/k/a "Joseph," a/k/a "Sam," SAMUEL BLAU, or SAMUEL GOLDBERGER, a/k/a "Benzi," the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 18, United States Code, Section 981, and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of ASHKENAZI, BLAU, and GOLDBERGER, up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982(a)(1) and Title 21, United States Code, Section 853.)


FOREPERSON


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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12 Cr.

(18 U.S.C. § 1956(h).)

PREET BHARARA

United States Attorney.

A TRUE BILL

 Foreperson.

8/1/12
MB

Indictment filed under seal with
arrest warrants issued. Ellis, USMJ